Mazda Toyota Manufacturing U.S.A. ("MTMUS") has applied to the Natural Resources Division of the City of Huntsville for revision of four (4) existing Prevention of Significant Deterioration (PSD) of Air Quality Construction Permits issued to MTMUS’s Joint Venture (JV) Facility, part of an automotive manufacturing campus ("MTMUS Campus"), located at 9000 Greenbrier Parkway NW in Huntsville, Limestone County, Alabama.

The main operations to be performed on the MTMUS Campus to facilitate the production of automobiles include parts pressing/stamping, parts/body welding, injection molding, painting/coating, component/body assembly, and tire assembly. The potential emissions from MTMUS campus are primarily from painting/coating operations and the combustion of natural gas in various types of equipment, including but not limited to thermal oxidizers used to abate emissions of volatile organic compounds (VOC) and volatile hazardous air pollutants (VHAP), ovens, heated flash-off units, and HVAC equipment. The emergency support equipment at the proposed facility will include diesel-fired emergency generators, natural gas-fired emergency generators, and diesel-fired fire water pump engines.

This permitting effort is, in part, in response to proposed revisions to thermal oxidizer configurations on four (4) paint shop operations on both the Mazda and Toyota lines in the JV Facility. As permitted, these four (4) operations are each controlled by a one (1) thermal oxidizer per operation, per line (eight (8) thermal oxidizers total). As proposed, each of the four (4) Mazda and Toyota line operations will share one (1) thermal oxidizer (four (4) thermal oxidizers total). Therefore, eight (8) thermal oxidizers will be replaced by four (4), with an overall decrease in heat input. As part of this permitting effort as well, Best Available Control Technology (BACT) nitrogen oxides (NOx) limitations are proposed to slightly increase due to manufacturer(s) being unable to guarantee the equipment at the currently permitted rate. Due to the overall proposed decrease in total heat input from the thermal oxidizer reconfiguration, this increase in the emission limitations will actually result in a slight decrease in potential combustion-related emissions from the combined paint line operations. A technical staff preliminary determination indicates that even with the proposed changes in the BACT limitations, BACT remains represented for NOx. Reassessments of BACT for all other applicable regulated pollutants were only required for the addition of a second diesel-fired fire water pump engine and the replacement of one (1) natural gas-fired emergency generator with a larger diesel-fired emergency generator for the MTMUS JV facility. No changes to the permits held by the support facilities (On-Site Providers (OSP)) are proposed in this permitting effort.

Natural Resources has determined that the revisions above either decrease or do not significantly increase previously estimated potential emissions from the facility for all pollutants, and a revised air quality impact analysis is not required at this time for those pollutants. However, as dictated in the original permitting effort, a revised full air quality impact analysis for all applicable regulated air pollutants is currently being performed by MTMUS with final expected emissions and building...
and stack specifications. This report is required to be submitted to Natural Resources for review and approval prior to start of MTMUS Campus operations, and submittal is expected in the very near future.

Natural Resources is proposing to issue the MTMUS Campus four (4) revised PSD Permits, and Drafts of these permits have been prepared. A public comment period, which begins upon publication of this Public Notice, has been established to give interested individuals an opportunity to provide additional information or comments. If significant comments are received, a hearing may be scheduled.

The following are links to the preliminary determination including the Draft permits and the permit application documents:

Preliminary Determination – Preliminary Determination & Proposed PSD Permits & Provisos

Permit Application - Air Permit(s) Revision Request #3 Application (submitted November 13, 2020), Amendment 1 (Submitted February 19, 2021), & Amendment 2 (Submitted May 11, 2021)

The scope of this public comment period is limited to air pollution and its effects. Comments relative to site selection or economic and social impacts are not within the scope of this public comment period.

Any person wishing to provide written comments may do so by writing Scott Cardno, Natural Resources Division, City of Huntsville, P.O. Box 308, Huntsville, Alabama, 35804. All comments must be received by 5:00 P.M. CST, June 29, 2021, or thirty (30) days from publication of this Notice, whichever is later.

After consideration of all written comments, review of any public hearing record, and consideration of the requirements of the Alabama Air Pollution Control Act, the Federal Clean Air Act, and applicable regulations, Natural Resources will make a final determination. Natural Resources will develop a response to comments, which will become part of the public record and will be posted in the same location on the City of Huntsville’s website as this Public Notice. Notice will be sent to any person requesting notice of the final action.

The administrative record for this action, along with other information on file, will be available for public review in the Natural Resources offices. An appointment to review this information can be obtained by contacting the Division of Natural Resources.